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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JOHN A BELLANTONI and MARIA T.  
BELLANTONI, His Wife,

Plaintiffs,

-against-

GENERAL MOTORS CORPORATION and  
CHAMPTON CARRIER CORP.,

Defendants.

08-CV-2407

Honorable C.L. Brient

FILED  
U.S. DISTRICT COURT  
S.D. OF N.Y. E.D.  
APR 23 2008

NOTICE OF MOTION TO ADMIT COUNSEL *PRO HAC VICE*

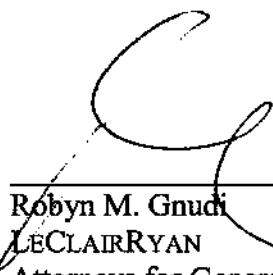
PURSUANT TO RULE 1.3 (c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Robyn M. Gnudi, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

BRIAN K. TELFAIR  
LeClairRyan, A Professional Corporation  
951 E. Byrd Street, 8<sup>th</sup> Floor  
Richmond, Virginia 23219  
(804) 783-7539; (804) 783-7639 (facsimile)

BRIAN K. TELFAIR is a member in good standing of the Bar of the State of Virginia

There are no pending disciplinary proceedings against BRIAN K. TELFAIR in any State or Federal court.

Dated: April 8, 2008  
New York, New York

  
Robyn M. Gnudi  
LECLAIRRYAN  
Attorneys for General Motors Corporation  
830 Third Avenue, Fifth Floor  
New York, New York 10022  
Phone: (212) 430-8020  
Fax: (212) 430-8079

And

Brian K. Telfair (*pro hac vice* admission pending)  
Antoinette N. Morgan (*pro hac vice* admission pending)  
LECLAIRRYAN  
Riverfront Plaza, East Tower  
951 East Byrd Street, 8<sup>th</sup> floor  
Richmond, Virginia 23219  
(804) 783-2003  
(804) 783-2294 (facsimile)

Counsel for General Motors Corporation

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JOHN A BELLANTONI and MARIA T.  
BELLANTONI, His Wife,

Plaintiffs,

08-CV-2407

-against-

Honorable C.L. Brieant

GENERAL MOTORS CORPORATION and  
CHAMPTON CARRIER CORP.,

Defendants.

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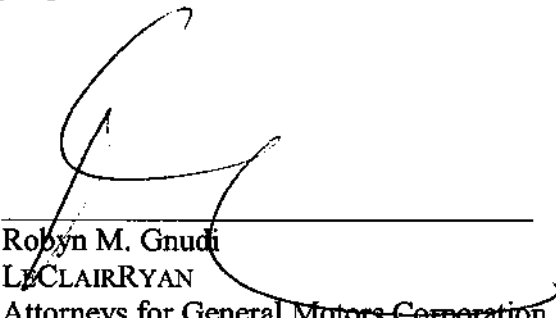
ANTOINETTE N. MORGAN  
LeClairRyan, A Professional Corporation  
951 E. Byrd Street, 8<sup>th</sup> Floor  
Richmond, Virginia 23219  
(804) 783-7544; (804) 783-7644 (facsimile)

ANTOINETTE N. MORGAN is a member in good standing of the Bar of the State of Virginia

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There are no pending disciplinary proceedings against ANTOINETTE N. MORGAN in any State or Federal court.

Dated: April 9, 2008  
New York, New York



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Robyn M. Gnudi  
LECLAIRRYAN  
Attorneys for General Motors Corporation  
830 Third Avenue, Fifth Floor  
New York, New York 10022  
Phone: (212) 430-8020  
Fax: (212) 430-8079

And

Brian K. Telfair (*pro hac vice* admission pending)  
Antoinette N. Morgan (*pro hac vice* admission pending)  
LECLAIRRYAN  
Riverfront Plaza, East Tower  
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Counsel for General Motors Corporation

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JOHN A BELLANTONI and MARIA T.  
BELLANTONI, His Wife,

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AFFIDAVIT OF ROBYN M. GNUDI IN SUPPORT OF MOTION  
TO ADMIT COUNSEL PRO HAC VICE

State of New York     )  
                                      ) ss:  
County of New York    )

Robyn M. Gnudi, being duly sworn, hereby deposes and says as follows:

1. I am an attorney at LeClairRyan, A Professional Corporation, counsel for Defendant General Motors Corporation in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant General Motors Corporation's motion to admit Antoinette N. Morgan and Brian K. Telfair as counsel pro hac vice to represent Defendant General Motors Corporation in this matter.
2. I am a member in good standing of the bar of the State of New York and was admitted to practice law in 1989. I am also admitted to the bar of New Jersey and am in good standing with this Court.
3. I have known Antoinette N. Morgan since January 1, 2008.
4. I have known Brian K. Telfair since January 1, 2008.

## ***CERTIFICATE OF GOOD STANDING***

UNITED STATES OF AMERICA       )  
  )  
  ) ss.  
  )  
EASTERN DISTRICT OF VIRGINIA   )

**I, FERNANDO GALINDO, Clerk of the United States District Court for the  
Eastern District of Virginia, Richmond Division,**

**DO HEREBY CERTIFY that Antoinette Novella Morgan, ID #73235,  
was duly admitted to practice in said Court on March 17, 2008 and is in good  
standing as a member of the bar of said Court.**

**FERNANDO GALINDO, CLERK**

By:   
**Deputy Clerk**

**Dated at Richmond, Virginia  
on April 14, 2008.**

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## ***CERTIFICATE OF GOOD STANDING***

UNITED STATES OF AMERICA       )  
  )  
  ) ss.  
  )  
EASTERN DISTRICT OF VIRGINIA   )

**I, FERNANDO GALINDO, Clerk of the United States District Court for the  
Eastern District of Virginia, Richmond Division,**

**DO HEREBY CERTIFY that Brian K. Telfair, ID #40516, was duly  
admitted to practice in said Court on April 7, 1997 and is in good standing as a  
member of the bar of said Court.**

**FERNANDO GALINDO, CLERK**

By:   
**Deputy Clerk**

**Dated at Richmond, Virginia  
on April 14, 2008.**

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JOHN A BELLANTONI and MARIA T.  
BELLANTONI, His Wife,

Plaintiffs,

08-CV-2407

-against-

Honorable C.L. Brieant

GENERAL MOTORS CORPORATION and  
CHAMPTION CARRIER CORP.,

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ORDER FOR *PRO HAC VICE* ADMISSION OF ANTOINETTE N. MORGAN

Upon the motion of Robyn M. Gnudi, attorney for Defendant General Motors Corporation and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

ANTOINETTE N. MORGAN  
LECLAIRRYAN  
951 E. Byrd Street, 8<sup>th</sup> Floor  
Richmond, Virginia 23219  
(804) 783-7544  
(804) 783-7644 (facsimile)  
antoINETTE.morgan@leclairryan.com

is admitted to practice pro hac vice as counsel for Defendant General Motors Corporation in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:  
City, State:

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Honorable Charles L. Brieant, U.S.D.J.



UNITED STATES DISTRICT COURT  
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Honorable C.L. Briant

GENERAL MOTORS CORPORATION and  
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Defendants.

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CERTIFICATE OF SERVICE

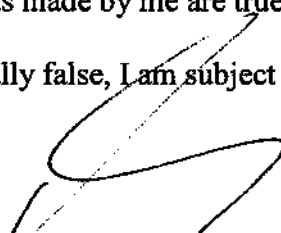
State of New York     )  
                                  ) ss:  
County of New York    )

I hereby certify that on the date set forth herein below I caused a true copy of the within Notice of Motion to Admit Counsel *Pro Hac Vice* to be mailed by United States Mail postage pre-paid to counsel as follows:

Jonathan Rice, Esq.  
247 West 35<sup>th</sup> Street, 12<sup>th</sup> Floor  
New York, NY 10001  
Attorneys for Plaintiffs

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: April 10, 2008



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Robyn M. Grudi  
LECLAIRRYAN  
Attorneys for General Motors Corporation  
830 Third Avenue, Fifth Floor  
New York, New York 10022  
Phone: (212) 430-8020  
Fax: (212) 430-8079